

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

SAHI COSMETICS L.L.C.,

Plaintiff,

v.

REA.DEEMING BEAUTY, INC.
D/B/A BEAUTYBLENDER,

Defendant.

Case No. 2:21-cv-10108-LJM-CI

Assigned to Hon. Laurie J. Michelson
Magistrate Judge Curtis Ivy, Jr.

**DECLARATION OF JOANNA
BLYTHE IN SUPPORT OF
DEFENDANT’S MOTION TO
DISMISS AND MEMORANDUM
OF POINTS AND AUTHORITIES
IN SUPPORT**

(Fed. R. Civ. P. 12(b)(6))

DECLARATION OF JOANNA BLYTHE

I, JoAnna Blythe, declare:

1. I am the Manager of Litigation Support at the firm Greenberg Glusker Fields Claman & Machtinger LLP, counsel for Rea.Deeming Beauty, Inc. d/b/a/ Beautyblender (“Defendant”) in this matter. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would competently testify to them under oath.

2. In connection with this litigation, I was asked by Josh Geller, counsel for Defendant, to purchase samples of the “Mystic primer serum” sold by Sahi

Cosmetics, LLC (“Plaintiff”), as well as samples of the “Opal Essence primer serum” sold by Rea.Deeming Beauty, Inc. (“Defendant”).

3. On March 24, 2021, I ordered samples of both the Mystic primer serum and the Opal Essence primer serum online from sahicosmetics.com and from beautyblender.com, the official websites for both Plaintiff and Defendant. These products were shipped to me at 2049 Century Park East Suite 2600, Los Angeles, CA 90067.

4. The products and their packaging are consistent with the photographs of the products included in Plaintiff’s Complaint. The products appear to be in their original packaging and do not appear to have been altered or tampered with in any way. To the best of my knowledge, they are authentic samples of the products that I understand to be at issue in this litigation.

5. I understand that those products are being physically filed and/or lodged with the Court in connection with Defendant’s Motion to Dismiss, and have been marked as **Exhibit 1** and **Exhibit 2**, respectively.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 15, 2021 at Los Angeles, California.


JoAnna Blythe